

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	
Todd D. Polin	:	Chapter 13
Heather E. Polin	:	No.: 18-13469-ELF
Debtor(s)	:	

OBJECTION TO CERTIFICATE OF DEFAULT

Debtors, Todd and Heather Polin, by and through their undersigned Counsel Brad J. Sadek, hereby object to Loancare LLC's (Movant) Certificate of Default on the following basis:

The debtors are in the process of applying for a loan modification on their mortgage through Loancare LLC. Movant has confirmed receipt of all relevant paperwork necessary to make a determination on the modification request.

Based on the Movant's instant filing, it is hereby respectfully requested that the Debtors' mortgage modification approval request be expedited.

WHEREFORE, Debtors respectfully request this Honorable Court to DENY Movant's Order requesting Relief from the Automatic Stay.

Respectfully submitted,

Dated: June 25, 2021

/s/ Brad J. Sadek, Esq.

Brad J. Sadek, Esq.
Attorney for the Debtor(s)
Sadek & Cooper
1315 Walnut Street, #502
Philadelphia, PA 19107
(215) 545-0008